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Ward (formerly Crisp)*

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

LATANIA CHURA,

Plaintiff,

vs.

**LYFT, INC., a Foreign Business
Corporation, and LEVI CRISP,**

Defendants.

Case No. 3:20-cv-00840

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332, 1441, and
1446

(Multnomah County Circuit Court Case
No. 20CV15964)

TO: The Judges and Clerk of the United States District Court for the District of Oregon:

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendants Lyft, Inc. and Levi Crisp (“Defendants”), hereby file this Notice of Removal of Civil Action, removing the above-captioned action from the Circuit Court of the State of Oregon for the County of Multnomah, in which it is pending, to the United States District Court for the District of Oregon.

In support of removal, both Defendants state as follows:

NOTICE OF REMOVAL IS TIMELY

1. On or about April 21, 2020, Plaintiff Latania Chura (“Plaintiff”) initiated this action by filing a Complaint in the Circuit Court of the State of Oregon for the County of Multnomah, docketed at Case No. 20CV15964 (“State Court Action”). The Complaint names Defendants Lyft, Inc., a Foreign Business Corporation and Levi Crisp (“Defendants”). (**Exhibit 1**).

2. Levi Crisp legally changed his name to Levi Ward in October 2019. (**Exhibit 2**).

3. This notice of removal is timely filed under 28 U.S.C. § 1446(b). Defendant Lyft, Inc. was served with a copy of Plaintiff’s summons and complaint on May 7, 2020 and Defendant Levi Ward was served by MVA service on May 19, 2020.

4. No further proceedings have been had in the Multnomah County Circuit Court as of the date of this removal. (**Exhibit 3**).

5. This is a civil action over which this court has original jurisdiction based on diversity of citizenship, pursuant to 28 U.S.C. § 1332, and due to the amount in controversy. Plaintiff’s Counsel confirms that Plaintiff Latania Chura is a resident of Multnomah County, Oregon. (**Exhibit 4**).

6. Defendant Lyft, Inc., is a Delaware Corporation with its principal place of business in San Francisco, California.

7. Levi Ward a citizen of the State of Massachusetts and has been since December 2019. (**Exhibit 5**).

8. Plaintiff’s Complaint includes a \$222,500 prayer for relief. (**Exhibit 1**). Therefore, the amount in controversy requirement as set forth in 28 U.S.C. § 1332, is satisfied.

9. Based on the foregoing, this Court has diversity jurisdiction pursuant to 28 U.S.C. §1332.

REMOVAL TO THIS DISTRICT IS PROPER

10. Pursuant to 28 U.S.C. §§ 1332 , 1441, and 1446, removal of the above-captioned state court action to this Court is appropriate.

11. Pursuant to 28 U.S.C. § 1441(a) and 1446(b), removal to this court is appropriate as the district and division embracing the place where the state court action is pending.

12. Defendants will promptly serve plaintiff with this Notice of Removal, informing plaintiff that this matter has been removed to Federal Court. Defendants will also promptly file a copy of this Notice of Removal with the Circuit Court of Multnomah County, Oregon, where the action is pending.

13. By removing this action, Defendants do not waive any objections or defenses, and Defendants specifically reserve all such objections or defenses it may have to this action.

DATED this 27th day of May, 2020.

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Aryn M. Seiler

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